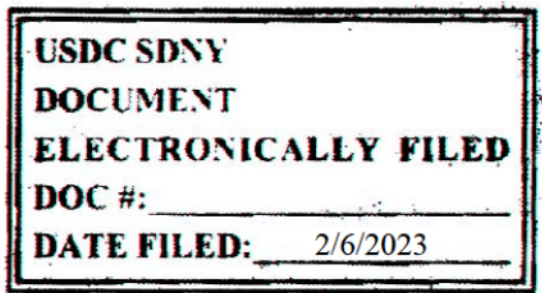


**KIRSCH &
NIEHAUS**



February 5, 2023

VIA ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

This firm, along with Morvillo Abramowitz Grand Iason & Anello P.C., represents Kreindler & Kreindler LLP (the “Firm”) in connection with the Firm’s appeal of your Honor’s order dated September 21, 2022. I write concerning the mandamus petition (the “Petition”) attached to the February 2, 2023 letter to Judge Daniels from Edward Spiro of the Morvillo firm.

After serving the Petition on all parties to the MDL via the Court’s ECF system, *see* ECF No. 8856-1, counsel for defendant Kingdom of Saudi Arabia (“KSA”) objected to one sentence in the Background section of the Petition (Page 7, Section B, second sentence). We asked the Clerk’s Office to issue an emergency provisional seal on the Petition to provide us an opportunity to assess KSA’s objection.

The Firm disagrees with KSA’s position but to avoid burdening the Court with unnecessary motion practice, the Firm has no objection to the sentence in question being redacted from the public version filed on ECF, with all MDL parties retaining the ability to access the unredacted Petition at ECF No. 8856-1. We therefore respectfully request that the Court authorize the ECF Clerk to accept a redacted filing for public access, with all MDL parties retaining the ability to access the unredacted Petition at ECF No. 8856-1. We understand that KSA consents to this request.

Because the Second Circuit clerk’s office is awaiting our confirmation of service of the Petition on all MDL parties, we ask that you consider this request on an expedited basis. Thank you for your Honor’s consideration of this request.

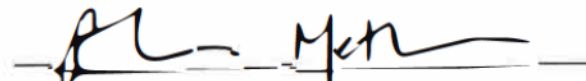
**KIRSCH &
NIEHAUS**

Respectfully Submitted,

/s/ Emily Kirsch

Emily Bab Kirsch

The party's request is GRANTED in part and DENIED in part. Kreindler & Kreindler is directed to file a redacted version of the Petition on the public docket. MDL counsel who want access to the unredacted version at ECF No. 8856-1 may email Netburn_NYSDchambers@nysd.uscourts.gov.
SO ORDERED.


SARAH NETBURN
United States Magistrate Judge

Dated: February 6, 2023
New York, New York